



Toiyabe Chapter P O Box 8096 Reno, NV 89507

Surface Transportation Board
395 E Street, S.W.
Washington, DC 20423-0001
<http://www.stb.dot.gov>

FD 35106

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Dear Board members,

It is unfortunate that we are here today talking to you. Unfortunate, because the need for a 300-mile railroad through the heart of Nevada is spurious, disputed, questionable and thoroughly unwarranted.

There should be no talk of additional rail line across virgin territory for several core reasons:

- the end point is a proposed facility
- the proposed facility has an incomplete design
- the transportation canisters for high level nuclear waste are not yet prototyped
- the transportation of the HLNW is deeply controversial and continues to draw strong opposition from many quarters
- the cost of nuclear power is sky-rocketing
- the new federal administration is already re-evaluating and re-prioritizing our national energy landscape.

There is a solid probability, and the probability is strengthening every day, that the proposed repository for high level nuclear waste at Yucca Mountain will never be built. There are too many questions, too much opposition to creating and transporting the most dangerous toxin ever known to man, too many concerns about global warming, too many profound changes in energy technology and financing that will all impact the decision of whether a HLNW repository will ever be built.

There is absolutely no "public convenience or necessity" for this rail line. The public in fact is highly inconvenienced, in several different ways, by the transportation of HLNW thousands of miles through every urban center of the continental United States to Yucca Mountain, and there is abjectly no necessity to do it.

A new rail line through Nevada should not be approved at this time because its need is in question.

As an environmental organization, the Sierra Club is intensely interested in the specific routing of any proposed disturbance to the landscape and the ecosystems that would be affected.

A large proportion of Nevada – over 80% of Nevada – is managed as public land. It is managed by federal or state agencies as national forest, wildlife refuges, areas of critical environmental concern, critical habitat under USF&WS habitat conservation plans for endangered and threatened species, National Park Service sites, wilderness, wilderness study areas, national conservation areas, national recreation areas, and state parks.

Any place in the desert where there is surface water is a precious place where plants and animals thrive, biodiversity is high, and people treasure. Here in Nevada, whether we are in the Mojave Desert or the Great Basin Desert, we fiercely protect our places with surface water. Surface water includes washes that have water only when the infrequent rains reach it. Surface water includes seeps and springs that slowly express water from between rock layers where plants and animals congregate. Surface water is not just the lakes and rivers of wetter places.

I live here in Las Vegas and my son is a junior at the University of Nevada in Reno. That's 450 miles from here, up highway 95, past Mercury and Yucca Mountain and Beatty, through Tonopah, past Luning and Mina, through Hawthorne and Yerington and Fernley. Every time I drive that route, I see wetlands, wildlife refuges and state parks. In the cold winter months, I watch the cottonwoods turn gold and the creeks steaming across the valleys with geothermal heat. I watch migrating birds search out the wet places to rest overnight. It's a beautiful place filled with living things.

There must be a careful examination of the specific resources along the proposed 300 mile corridor to determine what kinds of lands and what kinds of habitats, plants and animals would be affected by a disturbance there.

A new rail line through Nevada should not be approved at this time because its environmental impacts need to be carefully quantified.

Let me end by saying what the Sierra Club has said for the last 25 years about what we should be doing.

First, we should stop creating HLNW. We should close the nuclear power plants that we have and we should not build any more.

Second, we should make the HLNW that already exists as safe as possible and keep it as close as possible to the site where it was generated. That is how to minimize the exposure of both people and the environment to the risk and threats presented by most dangerous material known to man.

In particular, the proposed C22 storage casks need to have design, manufacture, quality control and monitoring procedures tested and finalized. These storage casks are

meant to store HLNW in Yucca Mountain, but these engineered barriers could be used to store safely waste near the sites of generation. Additionally, DoE and the nuclear industry should be working on better monitoring and maintenance for dry-cask and pool storage. This should include vastly better procedures for monitoring and inspecting dry casks, and procedures for transferring waste from them if/when they start to deteriorate. There is presently only limited ability to monitor, and no ability at all to transfer from defective casks. Finally, sites close to every nuclear power plant need to be identified and secured for long term storage. Right now, these places are short-term storage sites and they need to be managed for long-term storage.

Instead of wasting money on premature and unwarranted rail lines with the STB, the DOE should instead be working on pool storage and dry cask design and management and on site safety.

Thank you.

A handwritten signature in cursive script, reading "Jane Feldman".

Jane Feldman
Energy Chair